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ExxonMobil
Chemical

November 6, 2006

Mr. Charles M. Auer
Director
Office of Pollution Prevention and Toxics (OPPT)
U.S. Environmental Protection Agency (EPA)
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001

Re: EPA, OPPT letter (September 29, 2006) on NeoAcids C5 to C28 Category for the HPV Challenge Program (ExxonMobil Chemical Company Registration Number for HPV Challenge Program)

Dear Mr. Auer:

ExxonMobil Chemical Company (EMCC) is strongly committed to the chemical industry's Responsible Care® program and takes seriously its commitment to the responsible manufacture, testing, and safe use of its products. As further evidence of this commitment, EMCC agreed to develop study summaries and hazard testing plans for over 130 chemicals under the U.S. Environmental Protection Agency (EPA) and International Council of Chemical Associations' High Production Volume (HPV) programs.

EMCC has previously communicated to the EPA our company's agreement to participate in the HPV Chemical Challenge Program (HPV Program). By copy of this letter, EMCC reaffirms its commitment to providing select hazard data for the NeoAcids C5 to C28 Category to the HPV Program.

In January 2002, EMCC submitted a test plan and robust study summaries under the High Production Volume (HPV) Chemical Challenge Program (Program) for the NeoAcids C5 to C28 Category. EPA provided comments to EMCC on this test plan in October 2002 that detailed suggested revisions. EMCC believes it has sufficiently addressed these comments and has prepared a category analysis report to summarize the data for this category.

With this letter, EMCC submits the category analysis report and robust study summaries compiled into separate dossiers for each substance in the NeoAcids C5 to C28 Category. The report and dossiers reflect the addition of new data and revised robust summaries based on EPA comments. The extant database for this category characterizes the HPV endpoints for each member as detailed in the data matrix in the analysis report. With the

submission of this report and dossiers, EMCC has completed its commitment under the HPV Program for the NeoAcids C5 to C28 Category. Category members include:

- CAS# 75-98-9: Propanoic acid, 2,2-dimethyl-
- CAS# 598-98-1: Propanoic acid, 2,2-dimethyl-, methyl ester
- CAS# 95823-36-2: Carboxylic acid, C6-8 neo
- CAS# 26896-20-8: Neodecanoic acid
- CAS# 68938-07-8: Fatty acids, C9-C13 neo
- CAS# 72480-45-6: Fatty acids, C9-C28 neo

Please contact me if you require any further information on the status of EMCC commitments to the U.S. HPV Program.

Sincerely,

Nigel J. Sarginson
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Product Stewardship & Regulatory Affairs Manager
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Attachment

Bcc:

EMCC - Houston

S. Blevins

R. Brown

L. Keller

EMBSI - Clinton

A. Bachman

R. Davi

M. Lampi

C. Nessel

K. Pavkov

D. Winkelmann